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March 24, 2020

VIA ECF

Hon. Esther Salas, U.S.D.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street Room 5A
Newark, NJ 07101

Re: Advanced Gynecology and Laparoscopy of North Jersey, P.C., et al. v. Cigna Health and Life Insurance Co., et al., No. 2:19-cv-22234 (ES) (MAH)

Your Honor:

This law firm represents Defendants Cigna Health and Life Insurance Company and Connecticut General Life Insurance Company (collectively, "Defendants") in the above-referenced matter. We are writing to respectfully request leave to file an over-length brief in connection with Defendants' anticipated Motion to Dismiss the Complaint. Specifically, due to the length and number of counts in the Complaint, Defendants will need additional pages in excess of the 40-page limit set forth in Local Civil Rule 7.2. The Defendants' brief filed in support of the Motion is expected to be 45 pages in size 14 Times New Roman font (without tables).

Defense counsel has conferred with Plaintiffs' counsel regarding this matter and they have kindly consented on behalf of Plaintiffs to this request. As a reciprocal courtesy, we consent on behalf of Defendants to Plaintiffs' request to file a 45-page opposition brief. Plaintiffs have also consented to Defendants' request to file a 17-page reply brief.

For these reasons, the parties respectfully request that the Court "So Order" this letter granting the following relief: Defendants shall have an additional five (5) pages for their moving brief and two (2) pages for their reply brief; Plaintiffs shall have an additional five (5) pages for their opposition brief.

We thank Your Honor for your kind attention to this matter. Please do not hesitate to have the Court's staff contact me with any questions or concerns about the foregoing or if we can be of any service to the Court whatsoever.

GIBBONS P.C.

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Respectfully,

s/E. Evans Wohlforth, Jr.

E. Evans Wohlforth

cc: All Counsel of Record (via ECF)